

Christine Cusack

From: Christine Cusack
Sent: Thursday, March 31, 2005 9:13 AM
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Cc: Jeff Asperger
Subject: Tate & Lyle remaining discovery

Gentlemen:

This will confirm my telephone discussions with both Tony and Bob regarding the remaining discovery. We will disclose Mike Parnell as our rebuttal expert. Tony has indicated he wants to take the depo. To solve the Heiner Popp issue, Tony has offered him for depo. If discovery is extended, we intend to continue to person the depo of Balita. Unless I hear from anyone else, this summarizes our positions and I suggest we indicate that we will need 90 days to complete this work. Tony, would you be kind enough to put all this in writing, if we are in agreement? Please feel free to use our proposal in preparing your draft. Thanks.

Jeff

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